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From: Skophammer, Stephanie
Sent: Tue 6/11/2013 6:18:51 PM
Subject: Summary of NMFS and USFWS prelim comments on the BDCP
[NMFS+Progress+Assessment+Regarding+the+BDCP+Administrative+Draft+4-11-13.pdf](#)
[U.S.+Fish+and+Wildlife+Service+Staff+BDCP+Progress+Assessment+4-11-13-1.pdf](#)

I suspect these progress assessments are not finding their way to HQ, although they are public documents.

Summary of Key Points from the NMFS and USFWS Progress Assessments from April 2013

- “Scientific literature cited in the plan, new analyses presented by DWR, and conclusions of the independent scientific review panel have reinforced our concern that the BDCP restoration plan has not been carefully thought out and has uncertain prospects for benefiting native aquatic estuarine species.”
- Cumulative effects of the project when combined with climate change and increased upstream exports show potential extirpation of salmon.
- Uncertainties associated with restoration efforts should be jointly considered as uncertainties associated for water operations since the entire plan is based on the success of restoration efforts.
- The BDCP should include flow as a stressor to recognize that conservation of listed species is managing water operations to assure adequate Delta outflow.
- The models do not allow for a “net negative effect” (scale 0 to 1); therefore this means that no project or conservation measure will ever be detrimental, the worst case is no effect.
- Proposed pumping criteria in the north delta will create reverse flows that will negatively impact green sturgeon
- There is no population-level effects of the plan on fish species.
- Proposed changes in flow will cause significant temperature stresses for salmon
- The analysis should include an evaluation of at least a partial failure of restoration efforts that have been assumed to be 100% successful and on which the entire restoration effort is hinged.

- There is inconsistency in the ways that export/inflow ratios have been applied to project scenarios
- The impacts to fish have been examined in a piecemeal fashion- and should show the importance of diminished flow magnitudes.
- The analysis cherry-picks projects from the RPAs in the Biological Opinions to be included in baseline assumptions.
- Loss of sediment supply coming from the Sacramento river is not evaluated.

Found here and also attached:

<http://baydeltaconservationplan.com/BDCPPlanningProcess/DocumentsAndDrafts.aspx>

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